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## Pfizer Australia

PFIZER AUSTRALIA PTY LTD ABN 50 008 422 348

**John Young**  
 Regional Director Australia/New Zealand  
 Chairman and Managing Director

5 January 2006

The General Manager  
 Adjudication Branch  
 Australian Competition and Consumer Commission  
 PO Box 1199  
 DICKSON ACT 2602

Dear Sir/Madam

### **Application for Revocation and Substitution (A90994-6) Lodged by Medicines Australia**

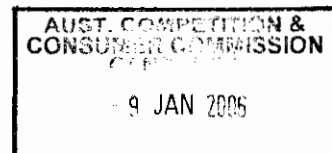
I refer to your letter of 5 December 2005 addressed to Mr Alan Taylor of Pfizer Australia Pty Ltd.

Pfizer Australia supports Medicines Australia's submission for authorisation (and interim authorisation) of the 15<sup>th</sup> edition of the Medicines Australia Code of Conduct ("Code").

Whilst Edition 14 of the Code has been very effective in regulating the marketing of prescription products to healthcare professionals and in enhancing the relationship between the pharmaceutical industry and members of the general public, Edition 15 makes a number of amendments that will serve to further improve the effectiveness of the Code.

For example:

- Section 3 of the new Code contains various provisions to improve the regulation of advertisements and promotional claims directed at healthcare professionals. These include provisions that address the placement of advertisements in electronic prescribing software packages and provisions that more clearly specify when important product information must be included in advertisements and promotional material.
- Section 4 sets out standards of conduct and knowledge for company representatives, requiring them to possess sufficient medical and technical knowledge to present product information accurately and be aware of all provisions of the Code. It also includes a new provision requiring various persons within companies to complete certain training.
- Section 5, which has been significantly amended, regulates the distribution of starter packs and information to be included with them so as to ensure they are used in a safe and appropriate manner.
- Section 9 includes new provision to address the involvement of companies in patient support programs.
- Section 10 contains new provisions to clarify the standards that are expected of pharmaceutical companies in their interactions with healthcare professionals in a variety of situations.



In short, therefore, the new Code contains various new and more detailed provisions that are intended to "raise the bar" to ensure that the highest ethical standards apply when pharmaceutical companies interact with healthcare professionals and that accurate and appropriate information about medicines is made available. The new Code should give patients/consumers greater confidence that the healthcare professionals they visit are fully informed about the medicines they are prescribing and are not being unduly or inappropriately influenced by the activities of pharmaceutical companies when making prescribing decisions.

Pfizer Australia submits that the new edition of the Code contributes substantial public benefit both through the high standards of conduct it imposes on pharmaceutical companies and the consumer protection mechanisms it contains. We do not consider that the new edition of the Code will cause any detriment to the general public or that it will have a substantial impact on competition between pharmaceutical companies. In our view, the new Code still allows pharmaceutical companies to effectively compete with each other – it simply requires them to do so in accordance with the high standards of conduct that are contained in and promoted by the Code.

Please do not hesitate to contact the writer if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Young', with a large, sweeping flourish extending from the bottom left.

**John Young**